# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

OSSIFI-MAB LLC,

Plaintiff,

ν.

AMGEN INC.,

Defendant.

Civil Action No. 1:23-10861-DLC

### JOINT CLAIM CONSTRUCTION STATEMENT PURSUANT TO L.R. 16.6(E)(1)(D)

Pursuant to Local Rule 16.6(e)(1)(D) and the parties' Joint Motion to Amend Schedule (D.I. 67), Plaintiff Ossif-Mab LLC ("OMAB") and Defendant Amgent Inc. ("Amgen") hereby provide the following joint statement regarding claim construction. The parties seek the Court's assistance in resolving disputes regarding the construction of 3 claim terms, which are set forth in the attached joint claim construction chart (Exhibit A) in the order the parties suggest they be construed. Also provided in the joint claim construction chart are the parties' respective positions on each term.

The parties have also provided agreed constructions for 11 terms.

Dated: December 21, 2023

## /s/ Michael R. Gottfried (with permission)

Michael R. Gottfried (BBO# 542156)
DUANE MORRIS LLP
100 High Street
Suite 2400
Boston, MA 02110
Tel.: (857) 488-4200

MRGottfried@duanemorris.com

Nicholas Groombridge (pro hac vice pending)
Eric Alan Stone (pro hac vice pending)
Daniel J. Klein (pro hac vice pending)
Michael F. Milea (pro hac vice pending)
GROOMBRIDGE, WU, BAUGHMAN
& STONE LLP
565 Fifth Avenue, Suite 2900
New York, NY 10017
Tel.: (332) 269-0030
nick.groombridge@groombridgewu.com
eric.stone@groombridgewu.com
dan.klein@groombridgewu.com
mike.milea@groombridgewu.com

Megan Raymond (*pro hac vice* pending)
Saurabh Gupta (*pro hac vice* pending)
GROOMBRIDGE, WU, BAUGHMAN
& STONE LLP
801 17<sup>th</sup> Street, NW, Suite 1050
Washington, DC 20006
Tel.: (202) 505-5830
megan.raymond@groombridgewu.com
saurabh.gupta@groombridgewu.com

Counsel for Defendant

#### Respectfully submitted,

#### /s/ Srikanth K. Reddy

Srikanth K. Reddy (BBO# 669264) Joshua Weinger (BBO# 690814) GOODWIN PROCTER LLP 100 Northern Avenue Boston, MA 02210 Tel.: (617) 570-1000 SReddy@goodwinlaw.com JWeinger@goodwinlaw.com

I. Neel Chatterjee (pro hac vice) GOODWIN PROCTER LLP 601 Marshall Street Redwood City, CA 94063 Tel.: (650) 752-3100 NChatterjee@goodwinlaw.com

Tiffany Mahmood (pro hac vice)
Jenevieve Nutovits (pro hac vice)
GOODWIN PROCTER LLP
620 Eighth Avenue
New York, NY 10018
Tel.: (212) 813-8800
TMahmood@goodwinlaw.com
JNutovits@goodwinlaw.com

Christopher Cassella (pro hac vice) GOODWIN PROCTER LLP 1900 N Street, NW Washington, DC 20036 Tel.: (202) 346-4000 CCassella@goodwinlaw.com

Counsel for Plaintiff

# **CERTIFICATE OF SERVICE**

I, Srikanth K. Reddy, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies shall be served by first class mail postage prepaid on all counsel of record who are not served through the CM/ECF system on December 21, 2023.

/s/ Srikanth K. Reddy

Srikanth K. Reddy (BBO# 669264) GOODWIN PROCTER LLP 100 Northern Avenue Boston, MA 02210

Tel.: (617) 570-1000